

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MICHIGAN**

In Re: Chhatrala Grand Rapids, LLC,  
dba Crowne Plaza Grand Rapids  
nka Bhogal Enterprises, LLC

Chapter 11 Bankruptcy Proceeding  
Filed: September 16, 2019  
Case No. 19-03908-jtg  
Hon. John T. Gregg

Debtor.

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In Re: Bhogal Enterprises, LLC,  
fka Chhatrala Grand Rapids, LLC  
dba Crowne Plaza Grand Rapids

Chapter 11 Bankruptcy Proceeding  
Filed: September 16, 2019  
Case No. 19-03909-jtg  
Hon. John T. Gregg

Debtor.

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**CREDITOR ACCESS POINT FINANCIAL, LLC'S MOTION TO  
DISMISS CASE PURSUANT TO 11 U.S.C. § 1112(b) AND 11 U.S.C. § 305  
WITH PREJUDICE**

Creditor, Access Point Financial, LLC, by and through its counsel, Keller & Almassian, PLC, hereby moves this Court for entry of an order dismissing this Chapter 11 proceeding pursuant to 11 U.S.C. § 1112(b) and 11 U.S.C. § 305, with prejudice. In support of this Motion, Plaintiff relies on the accompanying brief which is incorporated by reference.

Creditor further requests that a hearing be scheduled on this Motion as soon as practicable.

Respectfully submitted,  
KELLER & ALMASSIAN, PLC  
Attorneys for Access Point Financial, LLC

Dated: September 17, 2019

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